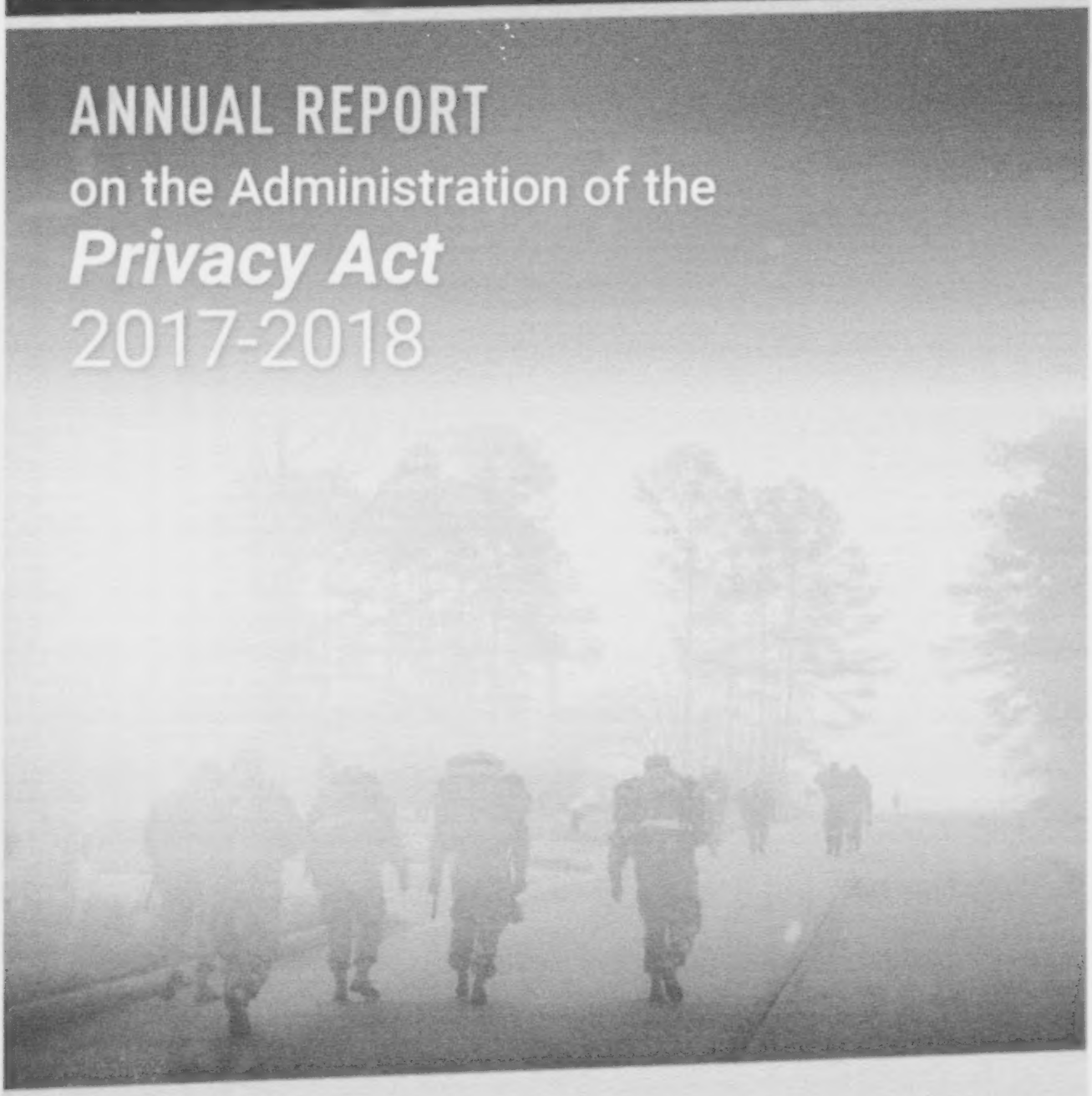
Veterans Affairs Canada | Anciens Combattants Canada

ANNUAL REPORT
on the Administration of the
Privacy Act
2017-2018



The Honourable Seamus O'Regan
Minister of Veterans Affairs and
Associate Minister of National Defence

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1. Introduction

Veterans Affairs Canada (VAC) and the Office of the Veterans Ombudsman (OVO) takes the responsibility to protect the privacy of Veterans and their families very seriously.

Privacy is a fundamental right in Canada. The *Privacy Act* operates to protect Canadians with respect to their personal information held by the Government of Canada.

The *Act* provides Canadians citizens and permanent residents with the general right to access, and seek and correction of their personal information that is held by the federal government. Under the *Privacy Act*, "personal information" is defined as "information about an identifiable individual that is recorded in any form." Examples include information about national or ethnic origin, colour, religion, age or marital status of an individual; education or medical, criminal, financial or employment history of an individual; address, fingerprints or blood type of an individual; and, any identifying number, symbol or other particular identifier assigned to an individual.

The *Act* also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information. Personal information may only be used for the purposes allowed by the *Privacy Act*, and may only be disclosed in accordance with the legislation.

This annual report on the administration of the *Privacy Act* outlines how VAC and the OVO fulfilled their responsibilities under the *Privacy Act* during the fiscal year beginning April 1, 2017 and ending March 31, 2018. This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

2. Mandate of Veterans Affairs Canada

VAC's mandate is set out in the *Department of Veterans Affairs Act*. It charges the Minister of Veterans Affairs with responsibility for *"...the care, treatment or re-establishment in civil life of any person who served in the Canadian Forces or Merchant Navy or in the naval, army, air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated . . . and the care of the dependents or survivors of any person referred to..."* VAC is also responsible for keeping alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

VAC recognizes that a successful transition from service to civilian life is best achieved when the overall well-being of Veterans is positive and reflects a balance of financial, mental, physical and social factors. VAC strives to be proactive, timely and compassionate in their response to Veterans and their families, and provide benefits and services designed to meet their unique needs.

VAC fulfills its mandate by supporting the care and well-being of Veterans and their dependents or survivors through a range of benefits, services, research, partnerships and advocacy, and by paying tribute to the sacrifices and achievements of those who served in Canada's military efforts.

3. Mandate of the Office of the Veterans Ombudsman

The OVO helps ensure that the sacrifices of Canada's Veterans and their families are recognized through the provision of services, benefits, and support in a fair, accessible, and timely manner. As an impartial and independent officer, the Veterans Ombudsman reports directly to the Minister of Veterans Affairs and works to ensure that Veterans, men and women of the Canadian Armed Forces (CAF), members and former members of the Royal Canadian Mounted Police (RCMP), as well as their families and other individuals that are clients of VAC are treated fairly and in accordance with the *Veterans Bill of Rights*.

The mandate of the Ombudsman, found in the *Order-in-Council P.C. 2007-530*, is to

- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives arising from the application of the provisions of the *Veterans Bill of Rights;*
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served (by VAC);
- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including individual decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and,
- Facilitate stakeholders' access to programs and services by providing them with information and referrals.

4. Organization

I Veterans Affairs Canada Access to Information and Privacy Office

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister of Veterans Affairs and the Deputy Minister to ensure that the Department fulfills its responsibilities under the *Access to Information Act* and the *Privacy Act*. The ATIP Coordinator

reports to the Director General of Information Technology, Information Management, Administration and Privacy, which is part of the Chief Financial Officer and Corporate Services Branch.

The main activities of VAC's ATIP Office include:

- Processing requests for information submitted under the *Access to Information Act* and the *Privacy Act,* including consulting with other federal departments and third parties with respect to requests received;
- Developing policies, procedures and guidelines in support of Access to Information and Privacy legislation and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Identifying trends in Access to Information requests and analyze opportunities to proactively release VAC information through Open Government;
- Providing awareness and training on access to information and privacy to ensure employees understand their roles and responsibilities;
- Monitoring compliance with both acts, regulations and central agency requirements;
- Preparing annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs);
- Acting as the point of contact to resolve complaints against VAC which have been submitted to the Information Commissioner of Canada and to the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches;
- Providing VAC staff with advice, guidance and training on ATIP issues;
- Analyzing and responding to privacy and access to information policy issues;
- Reviewing new and amended forms and processes that impact the collection of personal information;
- Developing appropriate Privacy Notice Statements; and,
- Evaluating contracts and Memoranda of Understanding.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office is comprised of two teams: Operations, and Policy and Governance. In 2017–2018, the VAC ATIP Office employed a total of 28.43 full-time equivalents (FTEs).

II Office of the Veterans Ombudsman Access to Information and Privacy Unit

The Veterans Ombudsman, Deputy Ombudsman and Executive Director (formerly Director General of Operations in Delegation Order in Annex 1), Legal Advisor, and Director, Corporate

Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties and functions of the Minister as the Head of Veterans Affairs, under the provisions of the *Acts* and related regulations (see Annex 1). Although four positions have been delegated full authority, the Director, Corporate Services and Charlottetown Operations, is responsible for management of the Access to Information and Privacy function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both Acts are met. Processing of requests is centralized within the unit. The unit consists of the Director, Corporate Services and Charlottetown Operations, and the Information Management Coordinator, and the Internal Services Project Officer. These two full-time staff members, and one part-time staff member were assigned to the administration of both *Acts* on a part-time (as required) basis during the 2017–2018 reporting period, which represents 0.31 of a FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and the *Privacy Act,* including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines, and processes in support of Access to Information and Privacy legislation and central agency requirements;
- Monitoring legislative and regulatory changes that impact ATIP;
- Providing awareness and training on access to information and privacy to ensure OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts*;
- Leading the development of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice, guidance and training to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing forms and processes that impact the collection of personal information;
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating OVO contracts and Memoranda of Understanding.

5. Delegation Order

The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental and OVO officials through a delegation order (attached as Annex 1).

6. Highlights of the Statistical Report, 2017-18

The following summary provides an overview of key statistics on the administration of the *Privacy Act* at VAC and the OVO between April 1, 2017, and March 31, 2018. A more detailed breakdown can be found in Annex 2 (VAC and OVO Statistical Report). For separate interpretations, see Annex 3 (VAC Statistical Report) and Annex 4 (OVO Statistical Report).

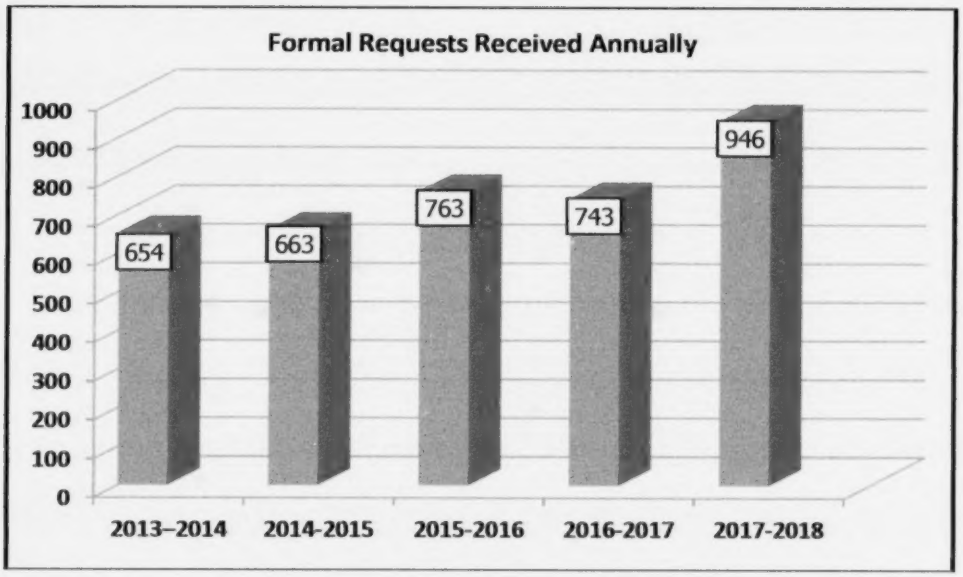
I Requests under the *Privacy Act*

A formal request is a written request made under the *Privacy Act* to the government institution that controls the record. The Department has 30 calendar days to respond. There are limited situations where extensions are permitted. If an extension is required, requestors are notified in writing. There is no fee to make a privacy request.

Between April 1, 2017 and March 31, 2018, the Department received 946 formal requests for information under the *Privacy Act* (941 by VAC and 5 by the OVO). This represents a significant increase (28% or 204 requests) for VAC which received 737 requests in 2016-2017. There is a slight decrease for the OVO which received 6 requests in 2016–2017. Along with the increase in requests experienced by VAC, the trend toward more complex, high volume privacy requests continues.

While the Department addresses the majority of requests formally, it also receives informal requests for personal information. An informal request is a request for information that is not made or processed under the *Act* (e.g., the request is not submitted formally via the online portal or on a Personal Information Request Form, or neither piece of legislation has been noted in the request). In 2017-2018, VAC processed 14 informal requests compared to 13 in 2016-2017.

No informal requests were received by the OVO during the 2017-2018 reporting period.

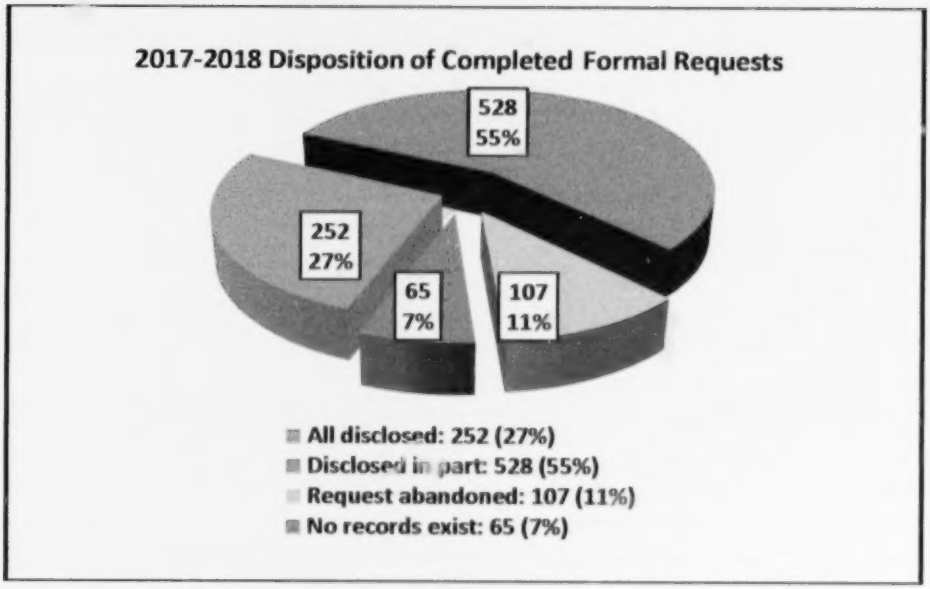


On April 1, 2017, VAC carried forward 99 open formal requests (99 for VAC and none for the OVO) from the previous year. Combined with the 946 requests (941 for VAC and 5 for the OVO) received in 2017–2018, a total of 1045 requests (1,040 for VAC and 5 for the OVO) were active during the 2017–2018 fiscal year. The Department completed 952 formal requests during the reporting period (947 by VAC and 5 by the OVO), compared with 730 formal requests (724 for VAC and 6 for the OVO) completed in the previous year.

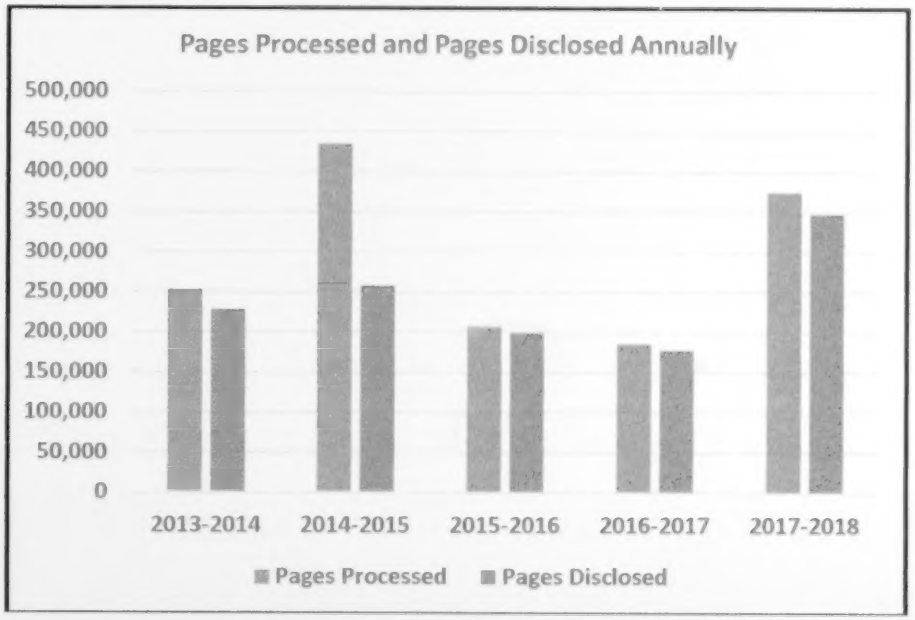
At the end of the 2017-2018 fiscal year, VAC carried forward 93 outstanding formal requests into the 2018–2019 fiscal year. None were carried forward by the OVO.

II Disposition of Requests Completed

In the majority (55%) of the formal requests completed in 2017-2018, information was disclosed in part to the requester. In a further 27% of cases, information was disclosed in full (see Section IV for further information on Exemptions). The following chart provides details on the disposition of the 952 requests completed in 2017-2018:



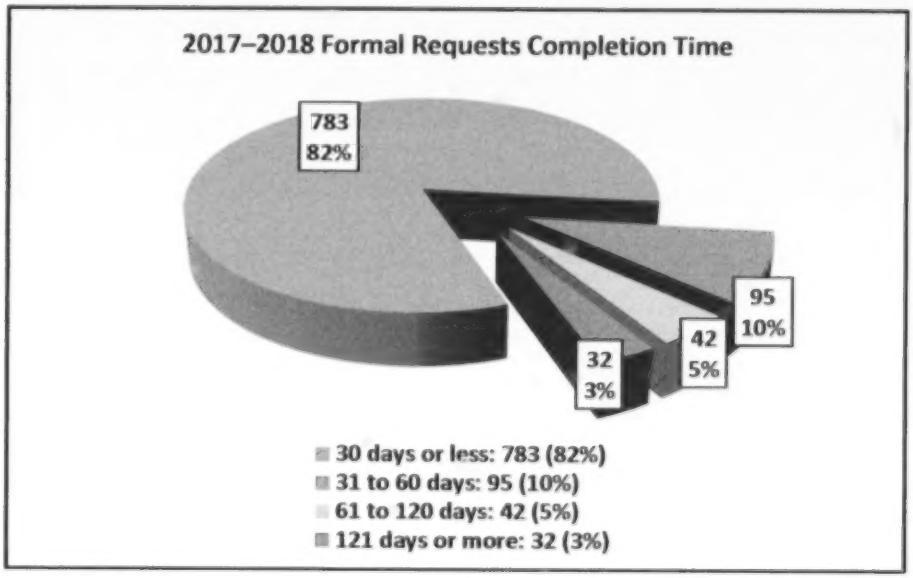
During the reporting period, VAC processed 374,292 pages and disclosed 346,931 pages, while the OVO processed and disclosed 175 pages. In total, VAC and the OVO processed 374,467 pages and disclosed 347,106 pages in 2017-2018. This is a 102% increase in pages processed and a 96% increase in pages disclosed, compared to the 2016–2017 fiscal year when 185,222 pages were processed and 177,469 pages disclosed.



III Completion Time

Of the 952 formal requests completed in 2017-2018, 84% or 804 (798 for VAC and 5 for the OVO) requests were completed on-time. Requests completed on-time means they were completed within 30-days or within the legislated extension time. This completion time is an improvement from 2016-2017 when 70% of formal requests were completed on-time. The significant improvement in completion time was coupled with a 28% increase in formal privacy requests and a 102% increase in pages processed. The enhanced completion time reflects VAC's commitment to provide personal information to requesters as quickly as possible.

As illustrated in the chart below, 82% or 783 of the 952 formal requests (778 for VAC and 5 for the OVO) were completed in 30 days or less. An additional 18% or 169 requests required more than 30-days to complete due to the complex nature of the requests, high volume of documents involved, consultations required, and an overall increase in the number of requests. In comparison, 68% (490) of requests were completed within the 30-day legislated time frame in 2016-2017, with an additional 240 requests (32%) requiring additional time and effort to complete.



IV Exemptions Cited

Canadians have a right of access to their personal information. The *Privacy Act*, however, identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the *Act* that authorizes the non- disclosure of

certain personal information in response to a privacy request. VAC invoked 557 exemptions[1] under sections 21, 22, 26, 27 and 28 of the *Privacy Act*. The most frequently applied exemption was section 26, which permits for the refusal to disclose information that relates to any individual other than the individual (e.g., family member) who made the request. This exemption ensures that the personal information of anyone, other than the requester, is protected. VAC invoked 540 exemptions under sections 26 in 2017-2018, compared to 398 in 2016-2017 The increased use of section 26 in 2017-2018 reflects the engagement of families in the rehabilitation, treatment and the well-being of Veterans.

No exemptions were applied by the OVO during the 2017-2018 reporting period.

The following table identifies the number of requests where specific types of exemptions were applied by VAC:

Exemptions cited	**2015-2016**	**2016-2017**	**2017-2018**
Paragraph 19(1)(*a*) (Information obtained in confidence)	0	0	0
Section 21 (International affairs and defence)	4	1	1
Paragraph 22(1)(*a*)(i) (Law enforcement and investigation)	0	1	2
Paragraph 22(1)(*a*)(ii) (Law enforcement and investigation)	0	1	1
Paragraph 22(1)(*b*) (Law enforcement and investigation)	2	1	1
Section 25 (Safety of individuals)	0	0	0
Section 26 (Information about another individual)	388	398	540
Section 27 (Solicitor-client privilege)	7	3	3
Section 28 (Medical record)	7	4	9
Total exemptions cited	**408**	**409**	**557**

V Exclusions Cited

Sections 69 and 70 of the *Privacy Act* set out exclusions. An exclusion is information to which the *Act* does not apply. Examples include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen's Privy Council for Canada. During this reporting period, there were two exclusions applied by VAC under section 70. No exclusions were applied by the OVO during the 2017-2018 reporting period.

[1] For statistical purposes, an exemption is counted only once when it is applied to a file multiple times.

VI Translation

Neither VAC nor the OVO received any privacy requests requiring translation during the 2017-2018 reporting period. This continues the trend from 2016-2017 when no requests for translation were received.

VII Corrections and Notations

Under the *Privacy* Act, individuals are entitled to request correction and notation of personal information when they believe there is an error or omission. No requests for corrections and notations were received by either VAC or the OVO in 2017-2018. In comparison, VAC received one request for correction in 2016-2017, which was actioned as a partial correction and partial notation.

VIII Extensions

During 2017-2018, a total of 25 requests were extended by VAC and none by the OVO. These extensions were due to consultation with other institutions. All 25 extensions were between 16 to 30 days in length. This is an increase from 16 extensions (16 for VAC and none for the OVO) taken in 2016-2017 for the same purpose.

IX Consultations

VAC did not receive any requests for consultation on VAC information from other government institutions or organizations during the 2017-2018 fiscal year. No consultations were carried forward into the 2018–2019 fiscal year. In comparison, VAC received and closed four requests for consultations from other government institutions or organizations during the 2016–2017 reporting period.

The decline in requests for consultation on VAC information is attributed to agreements in place between VAC and partner departments, such as the Department of National Defence, about what information requires consultation and what can be done within the VAC ATIP Office.

The OVO did not receive any requests for consultations from other government institutions and organizations during the 2017-2018 reporting period. No consultations were carried forward into the 2018-2019 fiscal year.

X Costs

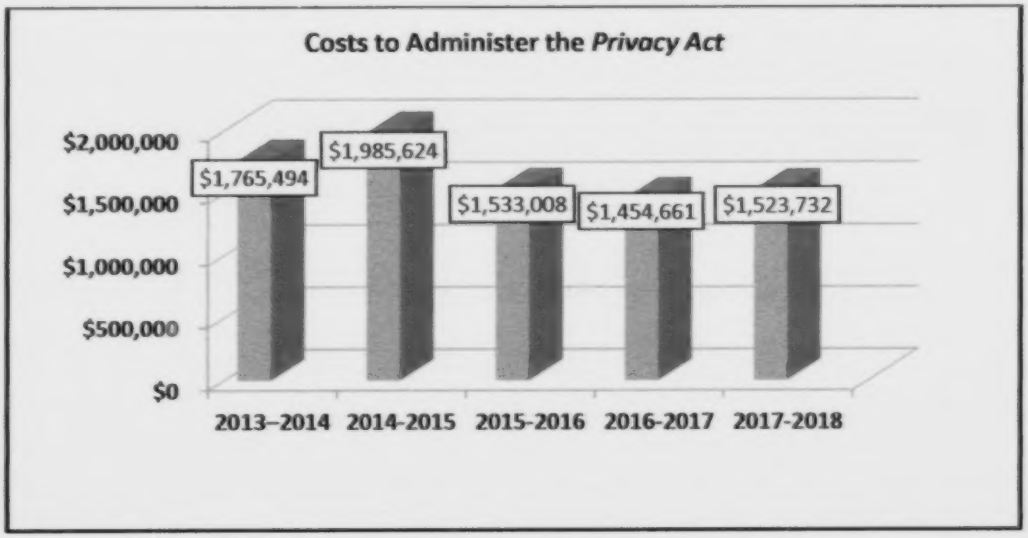
Given the relatively small size of the VAC ATIP Office, a number of FTEs are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. Total FTEs for the VAC ATIP Office in 2017-2018 were 28.43 compared to 28.40 FTEs in 2016-2017. While total FTEs remained relatively stable, there was an increase in salary costs due to contract settlements. Of

the 28.43 FTEs, 20.28 FTEs were dedicated primarily to the administration of the *Privacy Act* in 2017-2018.

The OVO ATIP Office had increased costs during the 2017-2018 fiscal year due to increased expenditures for salaries and professional services engaged to complete a Privacy Impact Assessment (PIA) on the Office's new case management system.

The VAC and OVO ATIP Offices spent a combined total of $1,523,732 to administer the *Privacy Act* during the reporting period. The breakdown is as follows:

(1) Staff salaries[2] $1,448,744 (VAC $1,426,905 and OVO $21,839)
(2) Professional services contracts amounted to $18,000 (VAC $0 and OVO $18,000); and,
(3) Other administrative costs (representing operations and maintenance expenditures) $56,988 (VAC $56,703 and OVO $285).



7. Training and Awareness

Increased emphasis was placed on ATIP awareness training for departmental staff during 2017-2018. Thirty-one sessions providing customized ATIP awareness training were offered to approximately 600 VAC employees and contracted staff. Other course offerings included Integrated Security/ATIP Training, National Orientation and Training Program, Privacy Impact Assessment Training, and Effective Information Management. In total, ATIP training was delivered to 1,977 participants in 219 training sessions.

[2] No overtime was reported in 2017-2018 for either VAC for the OVO.

The following describes the training activities related to privacy with respective participant numbers and sessions for each:

Integrated Security / ATIP Training
951 Participants in 145 Sessions

VAC's mandatory Security Orientation Training, offered to all employees upon entering the organization and then at periodic intervals, highlights:

- Need-to-Know principle;
- Concept of privacy breaches;
- Rules regarding accessing information;
- Disciplinary actions resulting from accessing personal information without authorization; and
- Overview of ATIP legislation and fundamentals.

ATIP Awareness Sessions
590 Participants in 31 Sessions

ATIP Awareness sessions focus on ATIP principles and best practices. The sessions are customized in order to provide a general overview of the *Access to Information Act* and the *Privacy Act;* the Duty to Assist, exemptions and exclusions; and, the roles and responsibilities related to privacy management. In addition, sessions are customized to focus on certain ATIP areas depending on the audience.

National Orientation and Training Program
30 Participants in 2 Sessions

As new front line employees, including Case Managers and Client Service Agents, are hired at VAC they are required to participate in a comprehensive orientation and training program. The new employees have an opportunity to be trained for their respective positions in a consistent way. ATIP is a focus of the training and includes roles and responsibilities from an ATIP perspective, including but not limited to: what is personal information; privacy breaches; what to document, role in retrievals related to ATIP requests; and, collection, use and disclosure principles.

Privacy Impact Assessment Training
10 Participants in 1 Session

ATIP hosted privacy impact assessment (PIA) training to program subject matter experts who are involved in the writing of PIAs. The training included an overview of the *Privacy Act* Legislation, the Treasury Board Secretariat Directive on PIAs, as well as a review of the CORE template and risk identification process.

Effective Information Management
396 Participants in 40 Sessions

Effective Information Management sessions included training on how to manage information, the use of GCDOCS, and the value of good information management, including ease of access to information and privacy retrievals.

Office of the Veterans Ombudsman (OVO) – specific training

OVO staff took part in Departmental ATIP training, and the OVO delivered ATIP Refresher training to 11 staff members and Personal Information Storage and Handling training to 7 staff members.

8. Policies, Guidelines, Procedures and Initiatives

The VAC ATIP Office continued to work with program areas and other Departments to ensure privacy principles were adhered to in relation to any information sharing required to support the delivery of Departmental programs and services. This was particularly significant for new programs implemented on April 1, 2018 including an Education and Training Benefit, Caregiver Recognition Benefit, Veterans Emergency Fund, and Career Transition Services. Some of these benefits allow family members to directly apply, but the applicant must provide identifying information about the Veteran. The programs raise new privacy considerations that were fully addressed in Privacy Impact Assessments. The program changes highlight one of the reasons why the VAC ATIP Office carried out work to develop a tool to more objectively and fully assess privacy risks in the context of evolving technology, and new privacy and security considerations.

In 2017-2018, changes were also made to the internal privacy incident notification process. This is further explained in Section 11 (I).

VAC and the OVO maintained and monitored current privacy policies, guidelines, and procedures during the 2017-2018 reporting period.

9. Summary of Key Issues and Actions Taken on Complaints or Audits

I Complaints

In the 2017-2018 reporting period, VAC received 12 complaints in relation to Privacy requests. Of the 12 complaints received by VAC, six were related to use and disclosure of personal

information; three were related to collection; two were related to time limits; and, one was related to denial of access.

VAC carried over 7 complaints from 2016-2017, for a total of 19 complaints requiring action in the 2017-2018 fiscal year. Some complaints were resolved through early resolution. VAC made representation to the Office of the Privacy Commissioner on 9 of the 19 complaints, of which five were pursuant to Section 33. Twelve of the 19 complaints received a ruling from the Office of the Privacy Commissioner of Canada during the reporting period. Eight were deemed well founded; 3 were deemed not well founded; and 1 was deemed not substantiated. The remaining 7 complaints were carried forward to 2018-2019. VAC takes any findings from the Office of the Privacy Commissioner of Canada seriously and acts on the recommendations.

In the 2017-2018 reporting period, OVO received no complaints in relation to privacy requests. No complaints were carried over from 2016-2017 and no complaints were carried forward to 2018-2019 for the OVO.

There were no appeals to the courts (for VAC or the OVO) during the 2017-2018 reporting period.

II Audits

During 2017-2018, the VAC Audit and Evaluation Division completed an audit of VAC's ATIP request processing practices between April 1, 2016 and March 31, 2017. The objectives of the audit were to:

(1) Assess the adequacy and effectiveness of policies, practices, and management controls to support departmental compliance with legislation regarding the processing of access to information and privacy requests; and,

(2) Confirm turnaround times and identify opportunities to improve efficiency of the processing of access to information and privacy requests.

The results of the audit of ATIP request processing were "generally acceptable." It was recognized that VAC has made significant improvements related to completion of requests within the legislated 30-day timeframe. In response to audit recommendations, the VAC ATIP office offered customized ATIP awareness training, as well as general training and tools, to approximately 600 employees and contract staff in 2017-2018. The VAC ATIP office also continues to improve data analysis in support of improved performance. The *Audit of Access to Information and Privacy Requests Processing* (March 2018) can be viewed on the VAC website at the following link: http://www.veterans.gc.ca/eng/about-us/reports/departmental-audit-evaluation/2018-audit-atip-requests-processing

10. Monitoring Compliance

I Veterans Affairs Canada

Monitoring

Using the robust case monitoring system in place that is supported by the VAC ATIP Office's case management software tool, the status of requests is reviewed by the ATIP Office to monitor deadlines, allocate resources, and report on the status of open requests. More specifically, monitoring is done as follows:

- Weekly and monthly statistical performance reports to monitor overall departmental performance provided to Directorate, Divisional and senior management;
- Weekly operational meetings with staff to review work plans, establish priorities and reallocate resources as necessary;
- Enhanced case management using ATIP case management software, including weekly review and monitoring of the status of requests and consultation processes on access requests by the VAC ATIP Office Team Leaders, Managers and Director;
- New and enhanced processes and tools to balance improved completion times with quality; and,
- Working closely with program areas throughout the Department, and holding a number of awareness and training sessions to support program areas in completing timely and quality retrievals.

The VAC ATIP Office continues to develop internal guidance documents and business processes to balance ease of access and administrative burden with protection of personal information.

Requests for Correction

VAC did not receive any requests for correction of personal information in 2017-2018. The VAC ATIP Office has a process in place to respond to these requests when they do occur, and works closely with the program area responsible to ensure corrections are made in a timely manner.

II Office of the Veterans Ombudsman

The OVO uses a tracking spreadsheet to monitor processing of requests for personal information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the Information Management Coordinator. Any anticipated issues with processing are escalated to the Director, Corporate Services and Charlottetown Operations.

Requests for Correction

The OVO has not received any requests for correction of personal information however, processes are in place to deal with any of these requests if they are received.

11. Material Privacy Breaches

I Veterans Affairs Canada

During the 2017-2018 fiscal year, 68 breaches impacting 269 individuals were confirmed by VAC. This is a 15% reduction in the total number of breaches compared to 2016-2017 (78 breaches) and a 92% decrease in number of individuals affected (3,425 individuals were affected in 2016-2017). The reduction in breaches reflects how seriously VAC takes the protection of personal information, and the importance of ongoing awareness, training, advice and guidance on what constitutes a privacy breach and how to prevent breaches from occurring. This work complements the internal policies and procedures in place about breach management.

A material privacy breach involves sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals. Of the 68 breaches reported in 2017-2018, there were two material breaches which impacted 186 individuals. One breach was due to a *My VAC Account* system error which allowed clients who were logged in concurrently to briefly view information belonging to other clients. This breach affected 185 individuals. As soon as the error was realized, *My VAC Account* was temporarily disabled to mitigate any further breaches and fix the system issue. The second material breach was due to misdirected mail, where a VAC client received a letter which was intended for another VAC client. While most incidents of misdirected mail are not material breaches, it was deemed material in this situation due to the nature of the letter and other circumstances. Both breaches were reported to the Office of the Privacy Commissioner and Treasury Board Secretariat. Impacted individuals were notified.

VAC treats every breach as a serious matter. In accordance with the Treasury Board Secretariat *Directive on Privacy Practices* and the *Guidelines for Privacy Breaches,* VAC reports only material breaches to the Office of the Privacy Commissioner and the Treasury Board Secretariat. VAC's practice is consistent with other government institutions and Treasury Board Secretariat guidance.

VAC staff are required to report privacy incidents as soon as possible. In 2017-2018, a new form was developed for use when reporting privacy incidents. In addition, the process was changed so that privacy incident reports are sent directly to the VAC ATIP Office rather than the VAC Security Office. This change in process ensures that the VAC ATIP Office is notified as soon as possible when an incident occurs, and can act to mitigate any issues right away. All incidents are investigated. When it is determined that a privacy breach has occurred, affected individual(s) are notified. Regular privacy breach updates are provided to Senior Management.

II Office of the Veterans Ombudsman

The OVO had no privacy breaches to report during the 2017-2018 reporting period.

12. Privacy Impact Assessments

In accordance with the Treasury Board Secretariat's *Directive on Privacy Impact Assessment*, the Department conducts PIAs on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and when services are contracted to another party. The purpose of a PIA is to ensure that privacy implications or risks are appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

During the 2017–2018 fiscal year, VAC submitted four new PIAs to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS) and provided one addendum, for a total of five. In addition, 22 PIA Needs Determinations were completed to determine if new or amended programs or projects required a full PIA.

The following programs and activities were assessed during the fiscal year:

Career Transition Services

Career Transition Services (CTS) supports the transition to civilian life of eligible Canadian Armed Forces Members, Veterans and their spouse/common-law partner, and survivors by providing access to services that will assist them in having the knowledge, skills and plan necessary to prepare for and obtain suitable civilian employment. The provision of support is based on need for the services and is contingent on the participant's ongoing involvement in developing and completing his or her career transition activities/plan. There are three components: career/vocational counselling, job search training/participation, and job-finding/job placement assistance. Career Transition Services PIA.

Caregiver Recognition Benefit

The Caregiver Recognition Benefit (CRB) formally recognizes the contribution caregivers make to the health and well-being of seriously injured Veterans who require continuous care and supervision, due to their service-related physical and/or mental health condition(s). This benefit is paid directly to Veterans' caregivers. Caregiver Recognition Benefit PIA.

Education and Training Benefit

The Education and Training Benefit (ETB) program provides funding that allows eligible Veterans to pursue further training and education. The funding is intended to cover tuition, fees, materials and some incidental and living expenses while eligible Veterans are engaged in formalized educational programs. Veterans may also use funding toward fees and other costs associated with short courses aimed at certification, professional designation, small business/entrepreneurship or personal development in support of a Veteran's meaningful activity and purpose. The amount of ETB available to Veterans is dependent on their number of years of service. Compensation is provided in the form of a lump sum payment directly to the Veteran. This program is delivered through grants.

ETB clients, who are also participants VAC's Career Transition Services (CTS) Program, may receive assistance from the CTS National Service Provider in making informed decisions in regards to their education and training program. Education and Training Benefit PIA.

Veterans Emergency Fund

The Veterans Emergency Fund (VEF) provides funding to assist Veterans and their families when facing emergency financial situations that threaten their health and well-being. Expenses in the event of an emergency that may be approved for funding could include (but are not limited to) food, clothing, shelter, medical care and expenses required to maintain safety and shelter. Information related to the administration of the VEF, which provides prompt monetary assistance to eligible Veterans and their family members who are facing financial crisis/emergency with the intent of resolving the immediate need. The VEF assists VAC in meeting its mandated commitments of assisting Veterans with the care, treatment and re-establishment in civilian life, as well as repaying the nation's debt of gratitude toward those who have sacrificed for our country. VEF payments will be paid as a grant. Veterans Emergency Fund PIA.

Addendum – Veterans Independence Program

The Veterans Independence Program (VIP) is a home care program that was created in 1981 to help eligible Veterans, civilians, as well as their survivors or primary caregivers remain independent and self-sufficient in their homes and communities through financial support towards the costs of services. VIP benefits do not replace other federal, provincial or municipal programs. Instead, the program complements existing programs or private insurance to help meet individual needs.

This assessment is an update to the 2010 VIP Privacy Impact Assessment (PIA) to support changes to the program, namely: the implementation of grants as the payment mechanism for housekeeping and grounds maintenance benefits; and the additional tasks performed by a third-party contractor, Medavie Blue Cross (MBC). In addition to its role as a payment processor for VAC, MBC now administers the annual renewal process that is required for VIP recipients. The annual renewal process includes a follow-up phone call to those whom VAC has identified as not having recent contact with the Department, and processing the annual renewal form

submitted by those receiving benefits via the "Survivor" eligibility gateway. Veterans Independence Program

During the 2017–2018 fiscal year, the OVO completed one PIA which was submitted to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). The following program was assessed during the fiscal year:

Ombudsman File Tracking System

The OVO implemented a new case management system, the Ombudsman File Tracking System (OFTS).

13. Public Interest Disclosures

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. Paragraph 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from disclosure, or if the disclosure would clearly benefit the individual to whom the information relates.

VAC and the OVO had no disclosures of personal information pursuant to paragraph 8(2)(*m*) of the *Privacy Act* during the 2017-2018 reporting period.

Annex 1: VAC and OVO Delegation Order – *Privacy Act* and Privacy Regulations

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X		
8(5)	Notice of disclosure under paragraph 8(2)(m)	X	X	X		
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X
17(3)(b)	Access in an alternative format	X	X	X	X	X

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
18(2)	Exempt banks	X	X	X	X	
19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b), 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations **Provisions and associated descriptions**						
11(2),11 (4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

Position	*Privacy Act*	*Privacy Regulations*
Veterans Ombudsman	Full delegation	Full delegation
Director General of Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation

Minister of Veterans Affairs

NOV 15 2017

Date

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada / Office of the Veterans Ombud

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	946
Outstanding from previous reporting period	99
Total	1045
Closed during reporting period	952
Carried over to next reporting period	93

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	72	159	19	2	0	0	0	252
Disclosed in part	50	343	70	38	18	6	3	528
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	32	27	4	1	1	0	0	65
Request abandoned	88	12	2	1	1	3	0	107
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	242	541	95	42	20	9	3	952

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2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	2	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	1	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	540
19(1)(f)	0	22.1	0	27	3
20	1	22.2	0	28	9
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	1	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	1
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	143	109	0
Disclosed in part	177	351	0
Total	320	460	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	25215	22604	252
Disclosed in part	344020	319768	528
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	5232	4734	107
Neither confirmed nor denied	0	0	0
Total	374467	347106	887

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	213	2851	27	5962	5	3314	7	10477	0	0
Disclosed in part	214	8467	124	25485	72	46653	115	219286	3	19877
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	101	58	2	637	2	1083	2	2956	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	528	11376	153	32084	79	51050	124	232719	3	19877

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	1	0	0	0	1
Disclosed in part	39	3	0	0	42
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	1	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0
Total	41	3	0	0	44

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
149	99	8	8	34

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	51	0	51
16 to 30 days	20	1	21
31 to 60 days	33	1	34
61 to 120 days	20	4	24
121 to 180 days	10	0	10
181 to 365 days	7	0	7
More than 365 days	2	0	2
Total	143	6	149

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
2	0	0	2

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	25	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	25	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	25	0
Total	0	0	25	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
12	5	8	0	25

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	6

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		$1,448,744
Overtime		$0
Goods and Services		$74,988
• Professional services contracts	$18,000	
• Other	$56,988	
Total		**$1,523,732**

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	19.33
Part-time and casual employees	0.78
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.46
Total	20.57

Note: Enter values to two decimal places.

Annex 3: Statistical Report on the *Privacy Act* (VAC)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	941
Outstanding from previous reporting period	99
Total	1040
Closed during reporting period	947
Carried over to next reporting period	93

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	71	155	19	2	0	0	0	247
Disclosed in part	50	343	70	38	18	6	3	528
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	32	27	4	1	1	0	0	65
Request abandoned	88	12	2	1	1	3	0	107
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	241	537	95	42	20	9	3	947

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2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	2	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	1	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	540
19(1)(f)	0	22.1	0	27	3
20	1	22.2	0	28	9
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	1	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	1
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	138	109	0
Disclosed in part	177	351	0
Total	315	460	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	25040	22429	247
Disclosed in part	344020	319768	528
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	5232	4734	107
Neither confirmed nor denied	0	0	0
Total	374292	346931	882

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	208	2676	27	5962	5	3314	7	10477	0	0
Disclosed in part	214	8467	124	25485	72	46653	115	219286	3	19877
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	101	58	2	637	2	1083	2	2956	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	523	11201	153	32084	79	51050	124	232719	3	19877

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	1	0	0	0	1
Disclosed in part	39	3	0	0	42
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	1	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0
Total	41	3	0	0	44

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
149	99	8	8	34

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	51	0	51
16 to 30 days	20	1	21
31 to 60 days	33	1	34
61 to 120 days	20	4	24
121 to 180 days	10	0	10
181 to 365 days	7	0	7
More than 365 days	2	0	2
Total	143	6	149

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
2	0	0	2

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	25	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	25	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	25	0
Total	0	0	25	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
12	5	8	0	25

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	5

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		$1,426,905
Overtime		$0
Goods and Services		$56,703
• Professional services contracts	$0	
• Other	$56,703	
Total		**$1,483,608**

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	19.14
Part-time and casual employees	0.68
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.46
Total	20.28

Note: Enter values to two decimal places.

Annex 4: Statistical Report on the *Privacy Act* (OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2017-04-01 to 2018-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	5
Outstanding from previous reporting period	0
Total	5
Closed during reporting period	5
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	1	4	0	0	0	0	0	5
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	1	4	0	0	0	0	0	5

TBS/SCT 350-63 (Rev. 2014/03)

Canada

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	0
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	5	0	0
Disclosed in part	0	0	0
Total	5	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	175	175	5
Disclosed in part	0	0	0
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	175	175	5

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	5	175	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	5	175	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	1

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		$21,839
Overtime		$0
Goods and Services		$18,285
• Professional services contracts	$18,000	
• Other	$285	
Total		**$40,124**

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.19
Part-time and casual employees	0.10
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.29

Note: Enter values to two decimal places.

Annex 5: Five-Year Statistical Analysis (VAC and OVO)

	2013–2014	2014–2015	2015–2016	2016–2017	2017–2018	Variance 2017–2018 and 2016–2017
Requests received	654	663	763	743	946	+27%
Requests carried forward from prior year	292	179	81	86	99	+15%
Total requests requiring action	946	842	844	829	1045	+26%
Completed requests	767	771	757	730	952	+30%
Requests carried forward to next year	179	71	87	99	93	-6%
Completed in 30 days or less	310	370	561	496	783	+58%
Exemptions invoked	411	508	408	409	557	+36%
Pages released	228,010	256,953	198,889	177,469	347,106	+96%
***Privacy Act*—Total costs of administration**	$1,765,494	$1,985,624	$1,533,008	$1,454,661	$1,523,732	+5%
FTEs	22.65	24.14	18.18	20.18	20.57	+2%
Complaints received	14	2	4	4	12	+200%
Complaints ruled on	46	18	7	3	12	+300%
PIAs completed	9	1	12	4	5	+25%

Annex 6: Definitions of Dispositions

These definitions provide a brief explanation of the status of a completed request.

All disclosed:

All the records relevant to the request were disclosed to the applicant (i.e., without the application of any exemptions or exclusions).

All exempted:

No information was disclosed because all of the information requested qualified for exemption. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution.

All excluded:

No information was disclosed because all of the information requested qualified for exclusion. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Disclosed in part:

Only a portion of the information requested was disclosed because the remainder was exempt and/or excluded. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. Excluded information is addressed in sections 68 and 69 of the *Access to Information Act*. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Does not exist:

The request provided sufficient information to identify the specific information sought but no relevant records were found.

Neither confirmed nor denied:

The Department could neither confirm nor deny the existence of any records pertaining to the request.

Request abandoned:

The request was abandoned either by the requester, or following a lack of response from the requester to a clarification letter.

Request transferred:

The request was transferred to another government department that was better suited to respond to the request.